

Monsanto

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Mr. Don R. Clay
Assistant Administrator
Office of Solid Waste & Emergency Response
Environmental Protection Agency
401 M Street S.W.
Washington, D. C. 20460

Dear Don:

2/26/90
Recently a memorandum from your office to our Soda Springs, Idaho plant concerning its proposed listing on the NPL was brought to my attention. In the EPA response by Mary Gade to Mr. Geddes' letter of January 23, 1990, it was stated that:

"I also would like to point out that the primary purpose of the NPL is informational, identifying for the public those sites and facilities that appear to warrant further investigation. The mere inclusion of a site on the NPL does not represent a final determination that further remedial action is warranted or will be taken."

Don, while I don't intend to comment on the specific Agency action on our plant facility, I must say that I am shocked at the oversimplification of the issue by the above statement and the naivete contained therein. Perhaps it is a reflection of the lack of a real purpose for the NPL and a failure to understand the impact of being listed. I believe there is a tremendous policy misunderstanding within this statement which goes to the very heart of an effective Superfund program.

The middle word in NPL is priorities. As Bill Reilly has indicated throughout his 90-day report, the Agency needs to focus the resources of the Superfund on maximizing cleanup actions and minimizing threats to public health. This would seem to demand priorities -- both on the part of the Agency, the Fund, and all affected parties to avoid diversion of critical resources. Doesn't it start with the NPL?

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As an example of the unnecessary diversion of resources that can result from unwarranted NPL listing, I would like to review what has happened since another Monsanto location -- the Augusta, Georgia facility -- was placed on the NPL. Prior to the NPL proposal, Monsanto had conducted a landfill removal action at a cost of approximately \$700k. Based upon the voluntary disclosure of this action to regulatory agencies and of additional groundwater monitoring data (and a lack of information on other sites in Georgia), the facility was scored and placed on the first list. In an effort to be removed from the list following the landfill removal action, Monsanto will spend nearly \$2 million and significant technical and management man-hours to meet the procedural requirements for delisting. I might add that this process also has taken considerable effort by the State agency and EPA. Should we be spending more to delist than to clean up? Obviously, we would like to avoid a recurrence of this situation at any other site.

To the extent that the NPL does not focus such resources on priority sites and sets in motion a costly delisting process, we will not be maximizing the effectiveness of the Superfund program.

Don, I would welcome the opportunity to further discuss the role of the NPL in the Superfund program. I am convinced it must be more than merely informational.

Sincerely,


H. J. Corbett

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